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May 5, 2008

**Filed via ECF**

Honorable Richard M. Berman, U.S. D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York City, NY 10007-1312

**Re:** Dionne Lee v. Bawuah & Cowan Systems, LLC  
Civil Action No. 07-cv-9917  
Our File No.: 801840

Dear Judge Berman:

Defendants, Cowan Systems, LLC and Richard K. Bawuah, herein write for the Court's assistance in the above-referenced matter.

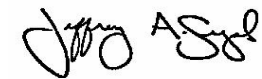
To date we still have not received plaintiff's Rule 26 Disclosures. Further, all discovery, including factual and expert, is to be completed by June 15, 2008. Depositions in this matter were previously scheduled for March 27, 2008, but cancelled by plaintiff's counsel. Depositions were then scheduled for April 28, 2008. However, on Friday, April 25, 2008, we attempted several times to reach plaintiff's counsel to confirm the depositions so that we could finalize travel arrangements for our driver as he resides out of state. As we were unsuccessful, the depositions were cancelled. In light of the foregoing, Defendants herein request a thirty (30) day extension of the discovery deadline.

Thank you for your assistance in this matter.

Respectfully submitted,

RAWLE & HENDERSON LLP

By:



Jeffrey A. Segal

/MLB

cc: Winston B. Rouse, Esquire